



March 13, 2006

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Via E-mail: aszv461@ecy.wa.gov

Re: Preliminary Draft Washington State Department of Transportation Statewide Stormwater Permit

Dear Annie,

Thank you for the opportunity to comment on the Preliminary Draft Washington State Department of Transportation (WSDOT) Statewide Stormwater Permit.

People For Puget Sound is a nonprofit, citizens' organization whose mission is to protect and restore Puget Sound and the Northwest Straits, including a specific goal to protect and restore the 2,000 miles of Puget Sound shoreline by 2015.

We support Puget Soundkeeper Alliance's comments – and specifically want to amplify the following points:

1. **Degree of requirements in permit.** Because the permit is for one department, it is an opportunity to be more prescriptive. We understand that WSDOT has asked to have a companion document – Stormwater Management Program – to accompany the permit. This document does not currently address many of the water quality issues and specifics that will be adequate to protect beneficial uses. Therefore, we believe that the permit must include more details and enforceable requirements.
2. **Tighter timeline.** Given that WSDOT has been working on updates to the permit for years, many of the timelines in the permit should be shortened.
2. **Western Washington Manual.** The manual, although containing many excellent features, has areas of weakness and acknowledges that the incorporation of all components will not fully address water quality issues related to Stormwater for threatened and endangered salmonids.
3. **Geographic scope of permit.** As we wrote in our previous letter, the scope of the permit should apply statewide as was proposed by WSDOT. WSDOT activities are intense uses, in any location in the state – not bounded by rural versus urban areas – and appropriate Stormwater controls should be applied at all locations. WSDOT staff

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has indicated that they plan to apply their controls throughout the state, as it is more efficient for them, and thus these requirements should be in the permit. Further, it will be easier for Department of Ecology staff if requirements are the same across the state rather than a pieced together approach.

4. **Water and sediment quality standards.** Given that the end goal of NPDES permits is to ensure fishable/swimmable waters, compliance with water quality standards is paramount. At a minimum the permit should include a narrative statement that prohibits discharges that cause or contribute to violations of water quality standards. In addition, we have observed that most NPDES permits issued by the Department of Ecology inadequately address sediment quality in Puget Sound and its drainages. There seems to be a gulf in the department between the NPDES program and the sediment contamination programs. This permit needs stronger language related to sediment contamination.
5. **Monitoring.** Given the large body of national data about toxic pollutants associated with transportation, this section of the permit should be more detailed and prescriptive. This permit covers a specific use with known pollutants (and a few unknowns) justifying a more detailed monitoring section. PAHs and phthalates should be specifically called out.

Overall, we would like to see strengthening of basic requirements in the permit, including those related to illicit connections (potentially a large issue in some areas), offsite BMPs, mapping (we know they already have extensive GIS maps for most locations, if not all!), pesticides/herbicides (should be prescribed in permit, especially for areas within x feet of streams, creeks, lakes and marine shoreline),

We look forward to continuing to work with you on this important permit. We can be reached at (206) 382-7007 X215 (Heather) or (360) 754-9177 (Bruce) if you have any questions or concerns.

Sincerely,

Heather Trim
Urban Bays Coordinator

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